

**CARR TELEPHONE COMPANY  
4325 S. MASTEN ROAD  
BRANCH, MI 49402  
231.898.2244 FAX 231.898.3900**

**Annual 47 CFR 64.2009(e) CPNI Certification  
EB Docket No. 06-36**

February 2, 2010

**REVISED**

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W. Suite TW-A325  
Washington, DC 20554

RE: Annual CPNI Compliance Certificate  
Carr Telephone Company  
Form 499 filer ID: 803700

Dear Secretary Dortch:

In accordance with 47 CFR 64.2009(e), please find attached the Carr Telephone Company's Annual Compliance Certificate for calendar year 2009. The Compliance Certificate is revised from the original filing dated February 1, 2010 and includes the Company's:

Statement explaining how its operating procedures ensure compliance with 47 CFR, Part 64, Subpart U:

An explanation of any actions taken against data brokers; and

A summary of all customer complaints received in the past year concerning the unauthorized release of customer proprietary network information (CPNI).

If you have any questions regarding this filing, please direct them to the undersigned.

Sincerely,

  
Teresa Bogner  
Secretary

cc: via email: Best Copy and Printing, Inc. FCC@BCPIWEB.COM

**CERTIFICATE OF COMPLIANCE WITH PROTECTION OF CUSTOMER  
PROPRIETY NETWORK INFORMATION RULES  
FOR 2009 FILING YEAR**

**Including:**

**Statement Explaining How Operating Procedures Ensure Regulatory Compliance  
Explanation of Any Actions Against Data Brokers, and  
Summary of all Customer Complaints Received**

**Carr Telephone Company signs this Certificate of Compliance in accordance with 222 of the Telecommunications Act of 1996, as amended, 47 CFR 64.2009, on behalf of Carr Telephone Company related to the previous calendar year, 2009.**

**This Certificate of Compliance addresses the requirements of 47 CFR 64.2009 that the Company provide:**

**A statement accompanying the certificate to explain how its operating procedures ensure compliance with 47 CFR, Part 64, Subpart U;**

**An explanation of any actions taken against data brokers: and**

**A summary of all customer complaints received in the past year concerning the unauthorized release of customer proprietary network information (CPNI)**

**On Behalf of the Company, I Certify as follows:**

**1. I am the Secretary of the Company, I am an officer of the Company and acting as an agent of the Company. My business address is 4325 S. Masten Road, Branch, MI 49402. The Company's Form 499 Filer ID is 803700.**

**2. I have personal knowledge of the facts stated in this Certificate of Compliance. I am responsible for overseeing compliance with the Federal Communications Commission's (FCC) rules relating to CPNI, 47 CFR 64.2001 et seq.**

**Statement Explaining How Operating Procedures Ensure Regulatory Compliance**

**3. I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the FCC's regulations governing CPNI.**

**4. The Company ensures that it is in compliance with the FCC's CPNI regulations. The Company trains its personnel regarding when they are authorized to use CPNI, and when they are not authorized to use CPNI and how to safeguard CPNI. The Company maintains a CPNI Compliance Manual in its office for purposes of training of new and current employees, and as a reference guide for all CPNI issues. The CPNI Manual contains key all essential information and forms to ensure the Company's compliance with CPNI regulations.**

**5. The Company has established a system by which the status of a Customer's approval for use of CPNI, as defined in 47 USC 222(h)(1), can be clearly established prior to the use of CPNI. The Company relies on the involvement of its high-level management to ensure that no use of CPNI is made until a full review of applicable law has occurred.**

**6. Company personnel make no decisions regarding CPNI without first consulting with management.**

**7. The Company has an express disciplinary process in place for personnel who make unauthorized use of CPNI.**

**8. The Company's policy is to maintain records of its own sales and marketing campaigns that use CPNI. The Company likewise maintains records of its affiliates' sales and marketing campaigns that use CPNI. The Company also maintains records of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. These records include a description of each campaign, the specific CPNI that was used in the campaign, and the products and services that were offered as a part of the campaign. The Company maintains these records in its offices for a minimum of one year.**

**9. In deciding whether the contemplated use of the CPNI is proper, management consults one or more of the following: the Company's own compliance manual, the applicable FCC regulations, and if necessary legal counsel. The Company's sales personnel must obtain supervisory approval regarding any proposed use of CPNI.**

**10. Further, management oversees the use of opt-in, opt-out or any other approval requirements, or notice requirements (such as notification to the Customer of the right to restrict use of, disclosure of, and access to CPNI), contained in the FCC's regulations. Management also reviews all notices required by the FCC regulations, for the compliance therewith. Before soliciting for approval of the use of a Customer's CPNI, the Company will notify the Customer of his or her right to restrict use of, disclosure of, and access to his or her CPNI.**

**11. The Company maintains records of Customer approval and disapproval for use of CPNI in a readily-available location that is consulted on an as-needed basis.**

**12. The Company trains its personnel for compliance with all FCC requirements for the safeguarding of CPNI, including use of passwords and authentication methods, for telephone access, online access, and in-store access to CPNI, and the prevention of access to CPNI (Call Detail Information in particular) by data brokers of "pre-texters." In store visits require valid photo identification.**

13. The Company on an ongoing basis, reviews changes in law affecting CPNI, and updates and trains Company personnel accordingly.

Explanation of Actions Against Data Brokers

14. The Company has not encountered any circumstances requiring it to take any action against a data broker during the year to which this Certificate pertains.

Summary of all Customer Complaints Received

15. The following summary of all customer complaints received in the past year concerning the unauthorized release of CPNI: None

16. The company does not at this point have any specific information on the processes pre-texters are using to attempt to access its Customer's CPNI.

The Company represents and warrants that this certification is consistent with 47 CFR 1.17, which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

February 2, 2010

  
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Teresa Bogner, Secretary  
Carr Telephone Company